

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

2011 MAR -1 PM 12: 01

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

DEPUTY

UNITED STATES OF AMERICA,

CRIMINAL NO.

Plaintiff,

A11CR 131 LY

INDICTMENT

v.

USAO #2011R00852

JUAN CARLOS RAMIREZ ZUNIGA,

(1)

AURELIA OCHOA HERNANDEZ,

(2)

JOSE "JOEY" LIRA,

(3)

GIOVANNA ALBERTA RIVERA,

(4)

JORDAN BREANN McCOY,

(5)

NICHOLAS DANIEL TOVAR,

(6)

BLANCA PAEZ TOVAR,

(7)

PEDRO DANIEL TOVAR,

(8)

TRACEY MARIE CASTILLO,

(9)

SCOTT PATRICK DAVIS,

(10)

ELVA MARIE HERNANDES,

(11)

LANCE MITCHELL COLL,

(12)

LYDIA CASTANEDA,

(13)

MONICA BELTRAN PASTOR,

(14)

ANNA CECILIA PEREZ,

(15)

MICHELLE LEE ALANIS,

(16)

ISELA ESMERALDA GUARDADO,

(17)

KRYSTAL RENEE AYALA,

(18)

CHRISTINA TREJO,

(19)

JUSTIN ALLEN CAUDLE,

(20)

and

)

VIDALIA LETICIA SUNIGA,

(21)

Defendants.

)

)

[Violations:

18 U.S.C. § 371- Conspiracy;

18 U.S.C. § 554- Smuggling of Firearms

18 U.S.C. § 924(a)(1)(A)- False Statements
in Firearm Records;

18 U.S.C. § 922(g)(1)- Felon in Possession
of a Firearm;

18 U.S.C. § 1956(h)- Conspiracy to
Commit Money Laundering;

18 U.S.C. § 1956(a)(2)- Money
Laundering]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 371]
Conspiracy

The Grand Jury re-alleges and incorporates the Scheme (numbered paragraphs 1-9) of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendant,

**JUAN CARLOS RAMIREZ ZUNIGA,
AURELIA OCHOA HERNANDEZ,
JOSE "JOEY" LIRA,
GIOVANNA ALBERTA RIVERA,
JORDAN BREANN McCOY,
NICHOLAS DANIEL TOVAR,
BLANCA PAEZ TOVAR,
PEDRO DANIEL TOVAR,
TRACEY MARIE CASTILLO,
SCOTT PATRICK DAVIS,
ELVA MARIE HERNANDES,
LANCE MITCHELL COLL,
LYDIA CASTANEDA,
MONICA BELTRAN PASTOR,
ANNA CECILIA PEREZ,
MICHELLE LEE ALANIS,
ISELA ESMERALDA GUARDADO,
KRYSTAL RENEE AYALA,
CHRISTINA TREJO,
JUSTIN ALLEN CAUDLE,
and
VIDALIA LETICIA SUNIGA,**

did knowingly and willfully combine, conspire, confederate and agree:

- (a) to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code; in violation of Title 18, United States Code § Section 924(a)(1)(A).
- (b) to fraudulently and knowingly export and send from the United States merchandise, articles and objects contrary to the laws and regulations of the United States; in violation of Title 18, United States Code § 554.
- (c) to receive, conceal, buy, sell and facilitated the transportation, concealment and sale of merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation contrary to the laws and regulations of the United States; in violation of Title 18, United States Code § 554

All in violation of Title 18, United States Code Section 371.

Manner and Means of the Conspiracy

1. It was the purpose of the conspiracy to acquire firearms in the State of Texas and transport those firearms to the Republic of Mexico. Specifically, the firearms were delivered to **Defendant Juan Carlos Ramirez Zuniga** in the Republic of Mexico.
2. It was part of the conspiracy that Defendant Jose "Joey" Lira and **Defendant Aurelia Ochoa Hernandez** were prohibited from owning, purchasing or possessing firearms because both had been convicted of a crime punishable by imprisonment for term greater than one year.
3. It was part of the conspiracy that, **Defendant Jose "Joey" Lira** enlisted and directed others to purchase firearms in the State of Texas.

4. It was part of the conspiracy that **Defendant Jose "Joey" Lira** enlisted and directed others to recruit additional persons to purchase firearms in the State of Texas. As part of the conspiracy, that **Defendant Jose "Joey" Lira** recruited **Defendants Lance Mitchell Coll, Jordan Breann McCoy, Isela Esmeralda Guardado, Daniel Pedro Tovar, Nicholas Daniel Tovar and Giovanna Alberta Rivera** to purchase firearm(s). While **Defendant Daniel Pedro Tovar** did not actually purchase a firearm he aided and abetted the firearm purchases of others.

5. It was part of the conspiracy that **Defendant Jordan Breann McCoy** recruited **Defendant Michelle Lee Alanis** to purchase firearms.

6. It was part of the conspiracy that **Defendant Nicholas Daniel Tovar** recruited **Defendants Lydia Castaneda, Krystal Renee Ayala and Justin Caudle** to purchase firearms.

7. It was part of the conspiracy that **Defendant Giovanna Alberta Rivera** recruited **Defendant Scott Patrick Davis, Christina Trejo and Tracey Castillo** to purchase firearms.

8. It was part of the conspiracy that **Defendants Blanca Paez Tovar and Daniel Pedro Tovar** recruited **Defendants Anna Cecilia Perez, Monica Beltran Perez, Elva Marie Hernandez and Vidalia Leticia Suniga** to purchase firearms.

9. It was part of the conspiracy that **Defendants Giovanna Alberta Rivera, Jordan Breann McCoy, Nicholas Daniel Tovar, Blanca Paez Tovar, Tracey Marie Castillo, Scott Patrick Davis Elva Marie Hernandez, Lance Mitchell Coll, Lydia Castaneda, Monica Beltran Pastor, Anna Cecilia Perez, Michelle Lee Alanis, Isela Esmeralda Guardado, Krystal Renee Ayala, Christina Trejo, Justin Caudle and Vidalia Leticia Suniga** purchased firearms. These defendants are collectively referred to as the "straw buyers."

10. It was part of the conspiracy that each of the “straw buyers” answered “Yes” to the following question posed on the Form 4473 related to their specific firearm’s purchase(s) knowing that they were not the actual buyer:

11.a. Are you the actual transferee, buyer of the firearm(s) listed on this form?
Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you. [bold font is used on the Form 4473]

11. It was part of the conspiracy that each of the “straw buyers” signed the Form 4473 related to their specific firearm purchase(s) in a signature block immediately below the following written certification:

I certify that my answers to Section A are true, correct and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering “yes” to question 11.a. if I am not the actual buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law.....I also understand that making any false oral or written statement....is a crime punishable as a felony under Federal law, and may also violate State and/or local law. [bold font is used on the Form 4473]

12. It was part of the conspiracy that, the majority of “straw buyers” were paid a fee for purchasing the firearm(s) and delivering those firearms ultimately to **Defendant Jose “Joey” Lira.**

13. It was part of the conspiracy that the purchased firearms would be prepared for transportation to Mexico by **Defendants Jose “Joey” Lira, Nicholas Daniel Tovar, and Giovanna Alberta Rivera.**

14. It was part of the conspiracy, that **Defendant Aurelia Ochoa Hernandez** transported the firearms from the State of Texas to the Republic of Mexico.

15. It was part of the conspiracy, that **Defendants Aurelia Ochoa Hernandez, Giovanna Alberta Rivera, Jordan Breann McCoy, Scott Patrick Davis and Tracey Marie Castillo** traveled to the Republic of Mexico and returned with cash from **Defendant Juan Carlos Ramirez Zuniga** for the firearms that had been transported to Mexico and for the purchase of additional firearms.

OVERT ACTS

In furtherance of the conspiracy and to effect the purposes and objects thereof, numerous overt acts were committed by the conspirators in the Western District of Texas and elsewhere. These acts include but are not limited to the purchases of the firearms described in Counts Three through Forty-Four of the indictment.

COUNT TWO
[18 U.S.C. § 554]
Smuggling Firearms

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy and the firearm purchases described in Counts Three through Forty-Four of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendants,

**JUAN CARLOS RAMIREZ ZUNIGA,
AURELIA OCHOA HERNANDEZ,
JOSE "JOEY" LIRA,
GIOVANNA ALBERTA RIVERA,
JORDAN BREANN McCOY,
NICHOLAS DANIEL TOVAR,
BLANCA PAEZ TOVAR,
PEDRO DANIEL TOVAR,
TRACEY MARIE CASTILLO,
SCOTT PATRICK DAVIS,
ELVA MARIE HERNANDES,
LANCE MITCHELL COLL,
LYDIA CASTANEDA,
MONICA BELTRAN PASTOR,
ANNA CECILIA PEREZ,
MICHELLE LEE ALANIS,
ISELA ESMERALDA GUARDADO,
KRYSTAL RENEE AYALA,
CHRISTINA TREJO,
JUSTIN ALLEN CAUDLE,
and
VIDALIA LETICIA SUNIGA**

aided and abetted by each other, did fraudulently and knowingly export and send from the United States merchandise, articles and objects (namely firearms) contrary to the laws and regulations of the United States, and did receive, conceal, buy, sell and facilitate the transportation, concealment and sale of said merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation contrary to the laws and regulations of the United States

All in violation of Title 18, United States Code §§ 554 and 2.

COUNTS THREE through FORTY-FOUR
18 U.S.C. § 924(a)(1)(A)
Making False Statement in Firearm Records

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

On or about the following dates, in the Western District of Texas, the Defendants,

JUAN CARLOS RAMIREZ ZUNIGA,
AURELIA OCHOA HERNANDEZ,
and
JOSE LIRA,

aided and abetted the defendant named below who knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants, did execute a United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that said defendant was the actual buyer of a firearm, when in truth and in fact, the defendant was acquiring the firearms on behalf of another person.

Count	Additional Defendant(s)	Date	Federal Firearms Licensee	Firearm Description on the Form 4473
3	Michelle Lee Alanis	October 22, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms International, Model GP1975, 7.62 x 39mm caliber rifle; (2) one Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle

4	Michelle Lee Alanis	October 28, 2010	Heritage Firearms in Austin, Texas	Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle
5	Krystal Ayalya	December 18, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model WASR 10/63, 7.62 x 39mm rifle; (2) one CAI, Model WASR 10/63, 7.62 x 39mm rifle
6	Lydia Castaneda	December 9, 2010	Austin Gun Liquidators in Round Rock, Texas	(1) one Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle; (2) one CAI, Model WASR 10, 7.62 x 39mm caliber rifle
7	Lydia Castaneda	November 27, 2010	R/T Rifle Shop in Buda, Texas	Three DPMS, Model A-15, .223 or 5.56 caliber rifles
8	Tracey Marie Castillo	December 22, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms, Model GP-1975, 7.62 x 39mm rifle; (2) one Century Arms, Model WASR-10/63 UF, 7.62 x 39mm rifle
9	Tracey Marie Castillo	January 20, 2011	Guns Galore in Killeen, Texas	Kel Tec, Model PLR-16, .223 pistol
10	Justin Allen Caudle (Attempt only)	January 15, 2011	The Gun Store in Cedar Park, Texas	Century Arms, Model Draco-C, 7.62 x 39mm pistol
11	Justin Allen Caudle	January 15, 2011	Cabelas in Buda, Texas	GP WASR, Model FLOR WASR 10, 7.62 x 39mm rifle

12	Lance Mitchell Coll	November 13, 2010	Ray Sparks @ gun show in Austin, Texas	Stag Arms, Model Stag-15, 5.56mm rifle
13	Lance Mitchell Coll	November 6, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15-E2S; (2) one Rock River Arms, Model LAR
14	Lance Mitchell Coll	November 30, 2010	Tex Guns in Austin, Texas	I.O. Inc., Model AK47C, 7.62 x 39mm rifle
15	Lance Mitchell Coll	December 13, 2010	Guns Galore in Killeen, Texas	(1) one IO Inc., Model AK-47, 7.62 x 39mm rifle; (2) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle
16	Scott Patrick Davis	December 23, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle; (2) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle
17	Scott Patrick Davis	January 17, 2011	Guns Galore in Killeen, Texas	Keltec, Model PLR16, .223 pistol
18	Scott Patrick Davis	January 20, 2011	Guns Galore in Killeen, Texas	CAI, Model Draco, 7.62 x 39mm pistol
19	Isela Esmeralda Guardado	October 23, 2010	The Gun Store in Cedar Park, Texas	(1) one Century International Arms, Model Draco, 7.62 x 39mm pistol; (2) one DPMS, Model A-15, .223 rifle

20	Elva Marie Hernandez, aided and abetted by, Pedro Daniel Tovar	October 29, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15E2S, 5.56mm rifle; (2) one CMMG, Model USA, 5.56mm rifle
21	Elva Marie Hernandez	November 3, 2010	The Gun Store in Cedar Park, Texas	(1) one Century International Arms, Model M70AB2T, 7.62 x 39mm rifle; (2) one Century International Arms, Model WASR 10/63, 7.62 x 39mm rifle (3) one Century International Arms, Model WASR 10/63, 7.62 x 39mm rifle
22	Elva Marie Hernandez	December 15, 2010	Austin Gun Liquidators in Round Rock, Texas	Century International Arms, Model WASR-10, 7.62 x 39mm rifle
23	Elva Marie Hernandez	January 25, 2011	Guns Galore in Austin, Texas	(1) one Keltec, Model, PLR-16, .223 caliber pistol; (2) one CAI, Model M70AB2, 7.62 x 39mm rifle; (3) one CAI, Model Draco, 7.62 x 39mm pistol
24	Jordan Breann McCoy	October 26, 2010	Tex Guns in Austin, Texas	DPMS, Model Panther Oracle, .223 caliber rifle
25	Jordan Breann McCoy	November 11, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model WASR-10, 7.62 x 39mm rifle; (2) one DPMS, Model A-15, .223 caliber rifle

26	Jordan Breann McCoy	December 22, 2010	Tactical Advantage in Round Rock, Texas	(1) one Keltec, Model PLR-16, .223 caliber pistol; (2) one Keltec, Model PLR-16, .223 caliber pistol
27	Monica Beltran Pastor	December 1, 2010	The Gun Store in Cedar Park, Texas	Century Arms, Model WASR-10, 7.62 x 39mm rifle
28	Monica Beltran Pastor	December 6, 2010	Guns Galore in Killeen, Texas	CAI, Model GP WASR 10/63, 7.62 x 39mm rifle
29	Monica Beltran Pastor	December 6, 2010	Guns Galore in Killeen, Texas	IO Inc., Model AK47-C, 7.62 x 39mm rifle
30	Monica Beltran Pastor	December 14, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model GP WASR 10/63, 7.62 x 39mm rifle; (2) one IO Inc., Model 10K47-C, 7.62 x 39mm rifle
31	Anna Cecilia Perez	November 12, 2010	Heritage Firearms in Austin, Texas	Bushmaster, Model XM-15, 5.56mm caliber rifle
32	Anna Cecilia Perez	November 13, 2010	Ray Sparks @ gun show in Austin, Texas	Stag Arms, Model Stag15, 5.56mm caliber rifle
33	Anna Cecilia Perez	December 1, 2010	The Gun Store in Cedar Park, Texas	Century International Arms, Model WASR10, 7.62 x 39mm rifle
34	Anna Cecilia Perez	December 6, 2010	Guns Galore in Killeen, Texas	Century International Arms, Model GPWASR10/63, 7.62 x 39mm rifle

35	Giovanna Alberta Rivera	December 17, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms, Model Draco, 7.62 x 39mm pistol; (2) one Century Arms, Model WASR 10/63 6F, 7.62 x 39mm rifle
36	Giovanna Alberta Rivera	January 3, 2011	Tactical Advantage Firearms in Round Rock, Texas	(1) one Kel-Tec, model PLR-16, .223 pistol; (2) one Century International Arms, model DRACO, 7.62 x 39mm pistol
37	Viadalia Leticia Suniga	November 12, 2010	Austin Gun Liquidators in Austin, Texas	Century Arms, Model WASR10, 7.62 x 39mm rifle
38	Blanca Paez Tovar, aided and abetted by, Pedro Daniel Tovar	October 28, 2010	The Gun Store in Cedar Park, Texas	Two Century International Arms, Model GP1975, 7.62 x 39mm rifles
39	Blanca Paez Tovar, aided and abetted by, Pedro Daniel Tovar	November 10, 2010	Heritage Firearms in Austin, Texas	Two Century International Arms, Model WASR-10, 7.62 x 39mm rifles
40	Nicholas Daniel Tovar	October 26, 2010	Tex Guns in Austin, Texas	(1) one Romanina, Model WASR-10, 7.62 x 39mm rifle; (2) one Armalite, Model M-15, .223 caliber rifle
41	Nicholas Daniel Tovar	October 27, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15, 5.56mm rifle; (2) one DPMS, Model A15, 5.56mm rifle

42	Nicholas Daniel Tovar	November 29, 2010	Guns Galore in Killeen, Texas	Two CAI, Model GP WASR10/63, 7.62 x 39mm rifles
43	Nicholas Daniel Tovar	January 14, 2011	The Gun Store in Cedar Park, Texas	Century Arms, Model GPWASR-10/63, 7.62 x 39mm rifle
44	Christina Trejo	December 30, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model Tantal Sporter, 5.45 x 39mm rifle; (2) one Keltec, Model PLR-16, .223 caliber pistol

All in violation of Title 18, United States Code Sections 924(a)(1)(A) and 2.

COUNT FORTY-FIVE
[18 U.S.C. § 922(g)(1)]
Felon in Possession of a Firearm

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy and the firearm purchases described in Counts Three through Forty-Four of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendants,

AURELIA OCHOA HERNANDEZ,
and
JOSE LIRA,

aided and abetted by each other, each of whom having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce firearms, namely: the firearms described in Counts Three through Forty-Four of this indictment and one Aero Precision Inc., Model AP15, .223 caliber rifle.

All in violation of Title 18, United States Code Sections 922(g)(1) and 2.

COUNT FORTY-SIX
[18 U.S.C. § 1956(h)]
Conspiracy to Commit Money Laundering

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendant,

JUAN CARLOS RAMIREZ ZUNIGA,
AURELIA OCHOA HERNANDEZ,
JOSE "JOEY" LIRA,

did knowingly and willfully combine, conspire, confederate and agree to commit **Money Laundering**, that is, to transport, transmit, transfer and attempt to transport, transmit and transfer monetary instruments and funds from and through a place outside the United States, namely the Republic of Mexico, to a place in the United States, namely the State of Texas and said monetary instruments did in fact involve the proceeds of specified unlawful activities, namely: Title 18, United States Code § 554 as described in Count Two of the Indictment:

- (a) with the intent to promote the carrying on of a specified unlawful activity; and
- (b) knowing the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity

In violation of Title 18, United States Code §§ 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i).

All in violation of Title 18, United States Code Section 1956(h).

COUNT FORTY-SEVEN
[18 U.S.C. § 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i)]
Money Laundering

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

On or about December 4, 2010, in the Western District of Texas and elsewhere, the Defendant,

AURELIA OCHOA HERNANDEZ,

aided and abetted by,

JUAN CARLOS RAMIREZ ZUNIGA,

did transport, transmit, transfer and attempt to transport, transmit and transfer monetary instruments and funds from and through a place outside the United States, namely the Republic of Mexico, to a place in the United States, namely the State of Texas and said monetary instruments did in fact involve the proceeds of specified unlawful activities, namely: Title 18, United States Code § 554 as described in Count Two of the Indictment:

- (a) with the intent to promote the carrying on of a specified unlawful activity; and
- (b) knowing the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code §§ 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i).

I.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[18 U.S.C. §§ 371, 922(g)(1), 924(a)(1)(A), 1956(a), & 1956(h)
and subject to forfeiture pursuant to 18 U.S.C. §§ 924(d)(1) & 982(a)(1)]

Forfeiture Statutes Relating to Firearms

[18 U.S.C. §§ 371, 922(g)(1), 924(a)(1)(A) and subject to forfeiture pursuant to 18 U.S.C. § 924(d)(1), made applicable by 28 U.S.C. § 2461]

As a result of the criminal violation as set forth in Counts One (1), Twenty-Three (23), and Forty-Five (45) of the indictment, which are punishable by imprisonment for more than one year, the United States gives notice that it intends to forfeit, but is not limited to, the below listed properties from **Defendants Juan Carlos Ramirez Zuniga (1), Aurelia Ochoa Hernandez (2), and Jose "Joey" Lira (3) and Elva Marie Hernandez (11)**. Said Defendants shall forfeit all right, title and interest in said properties to the United States pursuant to Fed. R. Crim. P. 32.2 and 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture pursuant to 28 U.S.C. § 2461, which states the following:

Title 18 U.S.C. § 924.

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922 . . . or knowing violation of section 924. . . shall be subject to seizure and forfeiture

This Notice of Demand for Forfeiture includes but is not limited to the following:

- a. One Century Arms International, Model M70AB2, 7.62 X 39 mm rifle, serial number M70AB18494;
- b. One Keltec, Model PLR-16, .223 caliber pistol, serial number P6X95;
- c. One Century Arms International, Model Draco, 7.62 X 39 mm rifle, serial number DC-6614-10; and
- d. One Aero Precision Inc., Model AP15, .223 caliber rifle, serial number US27830.

together with any ammunition and firearm accessories.

II.

Forfeiture Statutes Related to Money Laundering
[18 U.S.C. §§ 371, 1956(a), 1956(h)
and subject to forfeiture pursuant to 18 U.S.C. § 982(a)(1)]

As a result of the foregoing criminal violations as set forth in Counts One (1), Forty-Six (46), and Forty-Seven (47), which are punishable by imprisonment for more than one year, the United States gives notice that it intends to forfeit, but is not limited to, the below listed properties from **Defendants Juan Carlos Ramirez Zuniga (1), Aurelia Ochoa Hernandez (2), and Jose "Joey" Lira (3)**. Said Defendants shall forfeit all right, title and interest in said properties to the United States pursuant to 18 U.S.C. § 982(a), which states the following:

Title 18 U.S.C. § 982. Criminal forfeiture

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957, or 1960 of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the following:

- e. \$11,170, more or less, in United States Currency seized from **Defendant Aurelia Ochoa Hernandez** at the Port of Entry in Eagle Pass, Texas on or about December 4, 2010;
- f. \$5,882, more or less, in United States Currency seized from **Defendant Joey "Jose" Lira** on or about January 25, 2011.

A TRUE BILL:

**ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002**

JOHN E. MURPHY
UNITED STATES ATTORNEY

By: _____

Mark Lane
Assistant United States Attorney